

FILED 26 JAN '24 13:29 USDC-ORP

Moyata Anotta

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Plaintiff.

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Department of Justice

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Of Attorneys for Defendants

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

PORTLAND DIVISION

MOYATA ANOTTA, an individual; and
NW METALS, INC., an Oregon corporation,

Plaintiffs,

v.

OREGON DEPARTMENT OF
ENVIRONMENTAL QUALITY, an Oregon
governmental regulatory agency; RICHARD
WHITMAN, an individual; LEAH FELDON, an
individual; NINA DECONCINI, an individual;
DEREK SANDOZ, an individual; COURTNEY
BROWN, an individual; and STEVEN
DIETRICH, an individual,

Defendants.

Case No. 3:22-cv-00953-YY

MOTION TO COMPEL

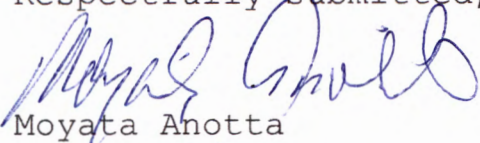
MOTION TO COMPEL

The Plaintiff, Moyata Anotta, moves pursuant to FRCP 45 for an Order compelling Sean Daoud, an Individual, to promptly produce all outstanding discovery materials subpoenaed, and in support, states as follows:

1. On October 7th, 2023, Plaintiff requested for Production of Documents. (exhibit S1A- S1B)
2. That to date, Plaintiff has not received a complete response to our discovery requests from Sean Daoud. The plaintiff is not looking for a court order for sanctions and fees. The plaintiff wants answers so we can proceed with the litigation without delay.

WHEREFORE, Plaintiff moves for an Order compelling the Defendants to produce complete required documents within 10 business days.

Respectfully submitted,



Moyata Anotta

1/26/24

MOTION TO COMPEL

AO 88A (Rev. 12/20) Subpoena to Testify at a Deposition in a Civil Action

UNITED STATES DISTRICT COURT

for the

STATE OF OREGON



Anotta et al

Plaintiff

v.

Oregon Department of Environmental Quality et al

Defendant

Civil Action No. 3:22-CV-00953-YY

SUBPOENA TO TESTIFY AT A DEPOSITION IN A CIVIL ACTION

To:

Sean Daoud

(Name of person to whom this subpoena is directed)

☐ Testimony: YOU ARE COMMANDED to appear at the time, date, and place set forth below to testify at a deposition to be taken in this civil action. If you are an organization, you must promptly confer in good faith with the party serving this subpoena about the following matters, or those set forth in an attachment, and you must designate one or more officers, directors, or managing agents, or designate other persons who consent to testify on your behalf about these matters:

Place:

Date and Time:

The deposition will be recorded by this method:

- ☒ Production: You, or your representatives, must also bring with you to the deposition the following documents, electronically stored information, or objects, and must permit inspection, copying, testing, or sampling of the material: Any and all communications regarding NW Metals Inc and/or Mo Anotta from the time period of March 12, 2018 to Oct 6th, 2023 with any individual, groups or with any State of Oregon agency and its employees. Provide materials subpoenaed by October 20th, 2023.

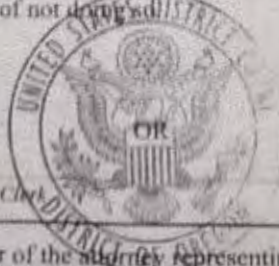
Provide materials via email anottam@gmail.com

The following provisions of Fed. R. Civ. P. 45 are attached - Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: 10/06/2023

CLERK OF COURT

[Signature]
Signature of Clerk or Deputy Clerk



Attorney's signature

The name, address, e-mail address, and telephone number of the attorney representing (name of party)

, who issues or requests this subpoena, are:

Moyata Anotta Email: anottam@gmail.com

phone: 503-367-6955

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

I received this subpoena for (name of individual and title, if any) Sean Daoudon (date) 10/06/2023☒ I served the subpoena by delivering a copy to the named person as follows: Seاون Daoud9645 N Columbia Blvd, Portland ORon (date) 10/07/2023 ; or☐ I returned the subpoena unexecuted because: _____

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also
tendered to the witness the fees for one day's attendance, and the mileage allowed by law, in the amount of
\$ _____

My fees are \$ 0.00 for travel and \$ 18.00 for services, for a total of \$ 18.00

I declare under penalty of perjury that this information is true.

Date: 01/25/2024


Server's signature

Mark Magnuson
Printed name and title

920 NW Kearney St Apt 108 Portland OR 97209
Server's address

Additional information regarding attempted service, etc.: